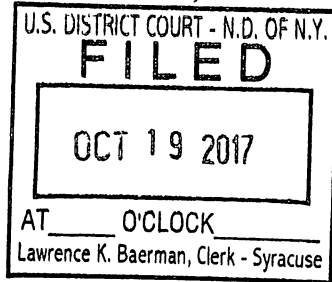


IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

PATRICIA L. WILLIAMS,



Defendant.

) Criminal No. **3:17-CR-326(TJM)**

) **Indictment**

) Violations: 18 U.S.C. § 641  
) [Theft of Government  
) Property]; 42 U.S.C.  
) § 1383a(a)(3)(A)  
) [Supplemental Security  
) Income Fraud]

) 2 Counts & Forfeiture Allegation

) County of Offense: Broome

**THE GRAND JURY CHARGES:**

**COUNT 1**

**[Theft of Government Property]**

From on or about May 3, 2005 through on or about December 5, 2013, in Broome County in the Northern District of New York, the defendant, **PATRICIA L. WILLIAMS**, willfully and knowingly did embezzle, steal, purloin, and knowingly convert to her own use money of the United States and a department and agency thereof and the value of such property was more than \$1,000, that is, the defendant spent more than \$104,000 of Social Security benefits paid by the United States Social Security Administration to her deceased husband's bank account when, as she then well knew, she was not entitled to that money, in violation of Title 18, United States Code, Section 641.

**COUNT 2**

**[Supplemental Security Income Fraud]**

From on or about August 27, 2008 through on or about October 15, 2015, in the Northern District of New York, the defendant, **PATRICIA L. WILLIAMS**, having knowledge of the

occurrence of an event affecting her initial and continued right to a benefit under Subchapter XVI of Chapter 7 of Title 42 of the United States Code, that is payment of Supplemental Security Income benefits, concealed and failed to disclose such event with the intent fraudulently to secure such benefit in a greater amount and quantity than was due to her and when no such payment was authorized, that is **WILLIAMS** did not disclose that she also collected the benefits intended for her deceased husband so that she would continue to receive Supplemental Security Income benefits when, as she then well knew, she was not entitled to those payments, in violation of Title 42, United States Code, Section 1383a(a)(3)(A).

### **FORFEITURE ALLEGATION**

The allegations contained in Count One of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

Upon conviction of the offense in violation of Title 18, United States Code, Section 641 set forth in Count One of this Indictment, the defendant, **PATRICIA L. WILLIAMS**, shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the offense. The property to be forfeited includes, but is not limited to, a money judgment in an amount no less than \$104,000.00 representing the proceeds traceable to the offense.

If any of the property described above, as a result of any act or omission of the defendant:

- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred or sold to, or deposited with, a third party;
- (3) has been placed beyond the jurisdiction of the court;

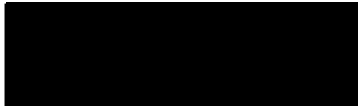
- (4) has been substantially diminished in value; or
- (5) has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

Dated: October 19, 2017

\*Name Redacted

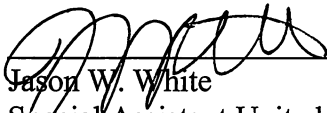
A TRUE BILL,



Grand Jury Foreperson

GRANT C. JAQUITH  
Acting United States Attorney

By:



Jason W. White  
Special Assistant United States Attorney  
Bar Roll No. 519172